

## STATE OF ILLINOIS ILLINOIS COMMERCE COMMISSION

ILLINOIS				
COMERGO FOLLHISSION				

JAN 17 2 09 PM '02

NANPA, on behalf of the Illinois Telecommunications Industry,	)	CHIEF CLERK'S OFFICE
	)	Docket No. 00-0677
Petition for Approval of Numbering Plan Area	)	
Relief Planning for the 618 Area Code	)	

## PETITION TO INTERVENE OF GRAFTON TELEPHONE COMPANY

NOW COMES, Grafton Telephone Company ("Grafton"), by its attorneys, Troy A. Fodor and E. M. Fulton, Jr. of the Law Firm of Troy A. Fodor, P.C., pursuant to Section 200.200 of the Rules of Practice and hereby respectfully requests that this Commission grant it leave to intervene and be treated as a party in this proceeding, and in support thereof states as follows:

- 1. This proceeding involves a petition by the North American Numbering Plan Administrator for approval of a numbering relief plan for the 618 area code.
- 2. Grafton is a telecommunication carrier within the meaning of Section 13-202 of the Illinois Universal Telephone Service Protection Law. Grafton provides local exchange telecommunications services on a non-competitive basis in a single exchange in the 618 area code in southern Illinois, namely the Grafton exchange.
- 3. Grafton is an Illinois corporation with its principal office located at 119 East Main Street, Grafton, Illinois, 62037. Its telephone number is (618) 786-3311. Grafton intends to be an active party in this proceeding and service of all documents herein should be on its attorneys listed below. Service may be by electronic means. The facsimile number is (217) 753-3937 and the e-mail address is troyafodor@aol.com.

The Company's service area is located in Jersey County, Illinois and is in the St. 4.

Louis Metro East region.

5. The matters which will be addressed in this docket will impact Grafton's provision of

telecommunications services in Illinois. Grafton has an interest in and will be affected by the

outcome of this proceeding.

6. Grafton provides telecommunications service to customers in portion of the area

served by the 618 area code and has been an assigned NXX code in the 618 NPA.

7. No other party may adequately represent the interests of Grafton in this docket.

8. Grafton's intervention in this Docket will not cause undue delay.

WHEREFORE, Grafton Telephone Company, respectfully requests this Honorable

Commission grant it leave to intervene and be treated as a party to this proceeding and grant such

other further relief as the Commission deems necessary, just and appropriate.

Respectfully submitted,

Grafton Telephone Company

By: Inn + For

Troy A. Fodor

E. M. Fulton, Jr.

TROY A. FODOR, P.C.

913 South Sixth Street

Springfield, Illinois 62703

Telephone: 217/753-3925

e-mail: troyafodor@aol.com

STATE OF ILLINOIS	)
	: SS
COUNTY OF JERSEY	)

The undersigned, Michael Arnold, being first duly sworn, on oath deposes and states that he is Vice President of Grafton Telephone Company, that he has knowledge of the facts and circumstances stated in the foregoing instrument and that the statements contained therein are true and correct as stated.

Michael Arnold

SUBSCRIBED and sworn to before me this /th day of Junary, 2002.

Otary Public

## CERTIFICATE OF SERVICE 00-0677

The undersigned, TROY A. FODOR, hereby certifies that on the 151 day of 2002, he served a copy of the foregoing instrument by personally delivering a copy thereof and/or mailing a copy thereof by electronic mail and/or United States Mail, postage prepaid, at Springfield, Illinois, to the individuals named on the attached Service List in envelopes plainly addressed to each of them.

John Albers, Hearing Examiner Illinois Commerce Commission 527 East Capitol Avenue Springfield, Illinois 62701 Email: jalbers@icc.state.il.us

Harvey Nelson Illinois Commerce Commission 527 East Capitol Avenue Springfield, Illinois 62701 Email: hnelson@icc.state.il.us

Janice A. Dale Mark G. Kaminski Assistant Attorney General Public Utilities Bureau 100 West Randolph Street, 11<sup>th</sup> Floor Chicago, Illinois 60601 Email: **jdale@atg.state.il.us** 

mkaminski@atg.state.il.us

Michael Guerra

John E. Rooney Sonnenschein, Nath & Rosenthal 8000 Sears Tower Chicago, Illinois 60606

Email: mguerra@sonnenschein.com jrooney@sonnenschein.com

Edward A. Butts 1800 West Hawthorne Lane, Room 102 West Chicago, Illinois 61085 Email: ebutts1000@aol.com Tom Stanton
Office of General Counsel
Illinois Commerce Commission
160 North LaSalle Street, Suite C-800
Chicago, Illinois 60601
Email: tstanton@icc.state.il.us

A. Randall Vogelzang Verizon Services Group 600 Hidden Ridge Irving, Texas 75038

Email: randy.vogelzang@verizon.com

Nancy Wells AT&T 620 South Fifth Street Springfield, Illinois 62703 Email: njwells@att.com

Scott Bohler Manager, State Government Affairs Citizens Communications Company 2378 Wilshire Boulevard Mound, Minnesota 55364 Email: sbohler@czn.com

Lee Ann Conti Citizens Telecommunications Company 1000 Internationale Parkway Woodridge, Illinois 60517 Email: lconti@czn.com Frank Colaco
Senior NPA Relief Planner
NeuStar, Inc.
8 Stratford Drive
Livingston, New Jersey 07039
Email: frank.colaco@neustar.com

Patricia Fleck Illinois Bell Telephone Company 225 West Randolph, 29B Chicago, Illinois 60605

Email: patricia.fleck@ameritech.com

Louise A. Sunderland Illinois Bell Telephone Company 225 West Randolph, 29B Chicago, Illinois 60601

Email: louise.sunderland@ameritech.com

Cheryl A. Tritt
Kimberly D. Wheeler
Morrison & Foerster, LLP
2000 Pennsylvania Avenue N.W. Ste.5500
Washington, DC 20006
Email: ctritt@mofo.com
kimberly.wheeler@neustar.com

J. Seamus Glynn
Julie Lucas
Citizens Utility Board
208 South LaSalle Street, Suite 1760
Chicago, Illinois 60604
Email: glynn@euboard.org

Email: glynn@cuboard.org jlucas@cuboard.org

Karen L. Lusson Citizens Utility Board 349 S. Kensington Ave. LaGrange, Illinois 60525 Email: klusson@aol.com David O. Rudd
Gallatin River Communications, L.L.C.
625 South Second Street
Springfield, Illinois 62704
Email: dorudd@aol.com

J. William Roberts
Rendi L. Mann-Stadt
Hinshaw & Culbertson
400 South Ninth Street
Springfield, Illinois 62701
Email: rstudt@hinshawlaw.com

Mr. Michael McDermott Verizon Wireless 1515 Woodfield Road, Suite 1400 Schaumburg, Illinois 60173 Email:

michael.medermoticaverizonwireless.com

Ann Hoskins Verizon Wireless 1300 I Street, Suite 400 Washington, DC 20005

Dana Smith
Verion Wireless
6 Campus Circle
Westlake, Texas 76262

Email: dana.smith@verizonwireless.com

Douglas A. Dougherty
Illinois Telecommunications Association
300 East Monroe Street, Suite 306
Post Office Box 730
Springfield, Illinois 62705
Email: <a href="mailto:ddougherty@ameritech.net">ddougherty@ameritech.net</a>

Joseph E. Donovan
Henry T. Kelly
O'Keefe, Ashenden, Lyons & Ward
30 North LaSalle, Suite 4100
Chicago, Illinois 60602
Email: hkelly@oalw.com

iedonovan@oalw.com

Lisa Volpe AT&T Wireless Services, Inc. 1150 Connecticut Avenue NW, 4<sup>th</sup> Floor Washington, DC 20036

Judy Argentieri AT&T Wireless Services, Inc. 804 West University Avenue Champaign, Illinois 61820

Email: judith.argentieri@attws.com

Kevin Saville
Citizens Communications Company
2378 Wilshire Boulevard
Mound, Minnesota 55364
Email: ksaville@czn.com

Peter J. Long
Cingular Wireless
2000 West Ameritech Center Drive -3H82
Hoffman Estates, Illinois 60195-5000
Email: peter.j.long@cingular.com

Dennis Muncy, Joseph D. Murphy & Matt C. Deering
Meyer Capel, A Professional Corporation
306 West Church Street
P.O. Box 6750
Champaign, IL 61826-6750
Email: <a href="mailto:imurphy@meyercapel.com">imurphy@meyercapel.com</a>

Kevin E. Jacobson
Egyptian Telephone Cooperative, Assn.
1018 West Broadway
Steelville, Illinois 62288
Email: kjacobs@egyptian.net

James T. Coyle
Shawnee Telephone Company
P.O. Box 69
Equality, Illinois 62934
Email: jcoyle@shawneelink.net

Gary Smith Lowenstein, Hagen & Smith, P.C. 1204 S. Fourth St. Springfield, IL 62703 Email: lexsmith@lhoslaw.com

Troy A. Fodor